

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:        EDWARD SILFIES  
              AKA: ED SILFIES  
              KELLY ELLIOTT  
              AKA: KELLY ANN ELLIOTT-SILFIES,  
              KELLY SILFIES

Debtors

CHARLES J. DEHART, III  
CHAPTER 13 TRUSTEE  
Movant

CHAPTER 13

CASE No. 5-16-04475-RNO

vs.

EDWARD SILFIES  
AKA: ED SILFIES  
KELLY ELLIOTT  
AKA: KELLY ANN ELLIOTT-SILFIES,  
KELLY SILFIES

Respondents

**REPLY TO TRUSTEE'S MOTION TO DISMISS CASE**

NOW COME the above-captioned Debtors, through their attorney, Raymond W. Ferrario, and reply to the Trustee's Motion to Dismiss case as follows:

1. The Debtors are filing a Motion to modify their confirmed Plan to extend the length of the payment plan in order to cover all arrearages.
2. The Debtors have been adversely affected by COVID-19 and are eligible to extend their confirmed Chapter 13 Plan by twelve (12) additional months.

WHEREFORE, Debtors, Edward Silfies and Kelly Ann Elliott, request the Court deny Trustee's Motion to Dismiss the case.

Respectfully submitted,

RAYMOND W. FERRARIO, P.C.

by s/Raymond W. Ferrario  
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Supreme Court I.D. No. 35096